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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365ACTION MEMORANDUM

DATE: April 23, 1992

SUBJECT: Removal Authorization for an Emergency Response Action
for the BP Sandy Plains Site, Marietta, Cobb County,
GeorgiaFROM: Paul R. Peronard *PRP*
On-Scene CoordinatorTO: File
Site ID #:

I. PURPOSE

The purpose of this Action Memo is to document the emergency removal actions described herein conducted at the BP Sandy Plains Site, at 2670 Sandy Plains Road, Marietta, Cobb County, Georgia. The BP Sandy Plains Site was referred to the Emergency Response and Removal Branch (ERRB) by the Marietta Police Department (MPD) on April 10, 1992. Two drums containing flammable liquids had been abandoned behind a dumpster at the BP gas station on the corner of Sandy Plains Road and Barrett Parkway. Because the exact contents of the drums were unknown, and because the drums were unsecured, the OSC mobilized an ERCS contractor to the Site. The total cost of the emergency response were within the OSC's \$50,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

On Friday, April 10, 1992, the MPD requested that the ERRB evaluate the potential hazards at gas station they were called to in Marietta, Georgia. Upon arrival on the evening of April 10, 1992, the OSC discovered two unmarked, 55-gallon containers of unknown liquid. Upon viewing the scene, the OSC issued a verbal Delivery Order to an ERCS contractor to do a hazard category screening, remove the drums to a secure facility, sample the drums to identify their contents, and then arrange for the appropriate disposal of the material.

2. Physical Location

The BP Sandy Plains Site is a gas station/convenience store located at 2670 Sandy Plains, Marietta Cobb County, Georgia.

There are several residences, a shopping center, three gas stations, and some other commercial enterprises within a one-quarter mile radius of the property. The shopping center is adjacent to the site, located on the same corner of the intersection. Both Sandy Plains Road and Barrett Parkway are heavily trafficked.

3. Site Characteristics

The BP Sandy Plains Site is a retail convenience store and gas station. A dumpster is located in the northeast corner of the quarter acre lot the site occupies. Two black 55-gallon polydrums were located directly behind the dumpster.

4. Release or Threatened Release Into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Since the liquid in the drums was determined to be flammable at a minimum, the liquid in the drums would meet the definition of RCRA characteristic waste D001. This means that the abandoned drums contained a hazardous substance, as defined by Section 101 of CERCLA. The abandonment of these drums constituted a threat of a release of hazardous substances to the environment.

5. NPL Status

The BP Sandy Plains Site is not currently on the NPL, and is unlikely to be considered for NPL status.

6. Maps, pictures and other graphic representations

None.

B. Other Actions to Date

1. Previous Actions

The OSC directed that the hazardous substances found at the site be screened for safe transport, and then moved to a secure RCRA facility. After this was completed the drums will be sampled to definitively identify their contents. Disposal arrangements will be made accordingly. The drums were transported to MKC, Inc. during the evening of April 10, 1992.

2. Current Actions

Arrangements for the disposal of the drums are being made, there are no current actions being conducted on-site.

C. State and Local Authorities' Roles**1. State and Local Actions to Date**

The drums were originally discovered by the Marietta Police Department. They referred the site to EPA for action on April 10, 1992. There has been no other state or local involvement at the site.

2. Potential for Continued State/Local Response

There is no potential for any further response at the BP Sandy Plains Site by State and Local authorities.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**A. Threats to Public Health or Welfare**

Since the drums were left unsecured there was a great potential for direct contact with any passerby. The flammable characteristics of the liquid in the drums presented a fire and explosion threat, which was accentuated since there were no mechanisms in place to separate the drums from potential ignition sources. Because the exact contents of the drums are unknown at this time, it is unknown if the drums presented any other health threats due to their toxicity. However, the drums did present a potential toxicity threat. If the contents of the drums exhibit any toxic characteristics, a direct exposure pathway to the public would have been easy to complete. The population most at risk were the people working at the BP station and its customers. Also, people driving into the shopping center would pass by the drums, as would pedestrians in the area.

B. Threats to the Environment

Due to their location the threat posed by the drums to the environment were minimal.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in the memorandum, may present an imminent and substantial endangerment to public health and the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS**A. Proposed Actions****1. Proposed Action Description**

The actions undertaken in the emergency response conducted on April 10, 1992, were to screen the contents of the two drums, and transport them to a secure RCRA storage facility. The exact contents of the drums will be identified and disposed of accordingly.

2. Contribution to Remedial Performance

No remedial actions are planned at this time.

3. Description of Alternate Technologies

N/A

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal ARARs determined to be practicable for the site are the Resource Conservation and Recovery Act (RCRA).

At this time, no State of Georgia requirements have been identified as substantively additional ARARs.

5. Project Schedule

The control phase of this action was initiated and finished on April 10, 1992. The analytical work on the drum samples should be completed by May 15, 1992. Disposal will be completed as soon as possible after identification.

B. Estimated Costs

The extramural cost of the emergency response action taken, including disposal, is \$20,000. No TAT costs were incurred. EPA direct and indirect costs are estimated at \$1500. Therefore, the total site ceiling is \$21,500.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If action was delayed or not taken, the risks posed to the public health or welfare and the environment would have increased. The BP Sandy Plains Site posed a substantial fire and explosion risk, and undoubtedly would have released hazardous substances to the environment if the drums had not been removed.

VII. OUTSTANDING POLICY ISSUES

No outstanding policy issues are involved at this site.

VIII. ENFORCEMENT

See attachment I

IX. RECOMMENDATION

This decision document represents the selected removal action for the BP Sandy Plains site, in Marietta, Cobb County, Georgia, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the site.

Because conditions at the site met the NCP section 300.415(b)(2) criteria for a removal action, I, as an On-Scene Coordinator, authorized expenditures not to exceed \$19,500 through procurement authority delegated to me under Authority Number 87-26-A008-B-0302.



Paul R. Peronard

On-Scene Coordinator

Emergency Response and Removal Branch

Environmental Protection Agency, Region IV

4/15/92

Date

ENFORCEMENT ATTACHMENT I

Work is underway to determine where the drums were purchased, and who purchased them. An attempt will then be made to trace the ownership of the drums, and the source of their contents.